

Fire2Wire  
5462 Pirrone Road  
Salida, CA 95368

Thursday, December 28, 2017

**Comments Regarding Notice of Proposed Rulemaking, GN Docket No. 17-258**

Fire2Wire has been providing Fixed Wireless Broadband Internet services in the greater San Joaquin Valley area of Central California for over 15 years, currently with residential speeds up to 25Mbps. Our service, that started as a temporary measure to get our rural customers by until the large mobile carriers, telcos, or cablecos came along, has continued to re-invent itself and become a necessity for many of our customers. Fire2Wire has enjoyed continued and sometimes explosive growth during this time, as new bandwidth-intensive applications become mainstream and commonplace. And after this 15 year span, none of the national operators have significantly invested in providing service to these areas. With the introduction of the CBRS band, we are presented with an opportunity to license spectrum that is well suited for operations in the rural areas that we have been serving with Unlicensed spectrum. However, the recent changes proposed in this NPRM are incompatible with the FCC's goal of providing and expanding broadband service in rural areas.

Expanding the size of PAL licenses from census tracts to PEAs is arbitrary and does nothing but allow larger operators to prevent smaller rural operators from successfully bidding on PALs for rural markets. If the larger PAL sizes are used, then it is very likely that Fire2Wire and other smaller operators will be unable to compete in the auction. If that is the case, and if the pattern holds, the larger operators will continue to focus on the dense urban markets, and the CBRS spectrum will go unused in rural areas. The attached image shows a map of Fire2Wire's service area with the accompanying PEA boundary.

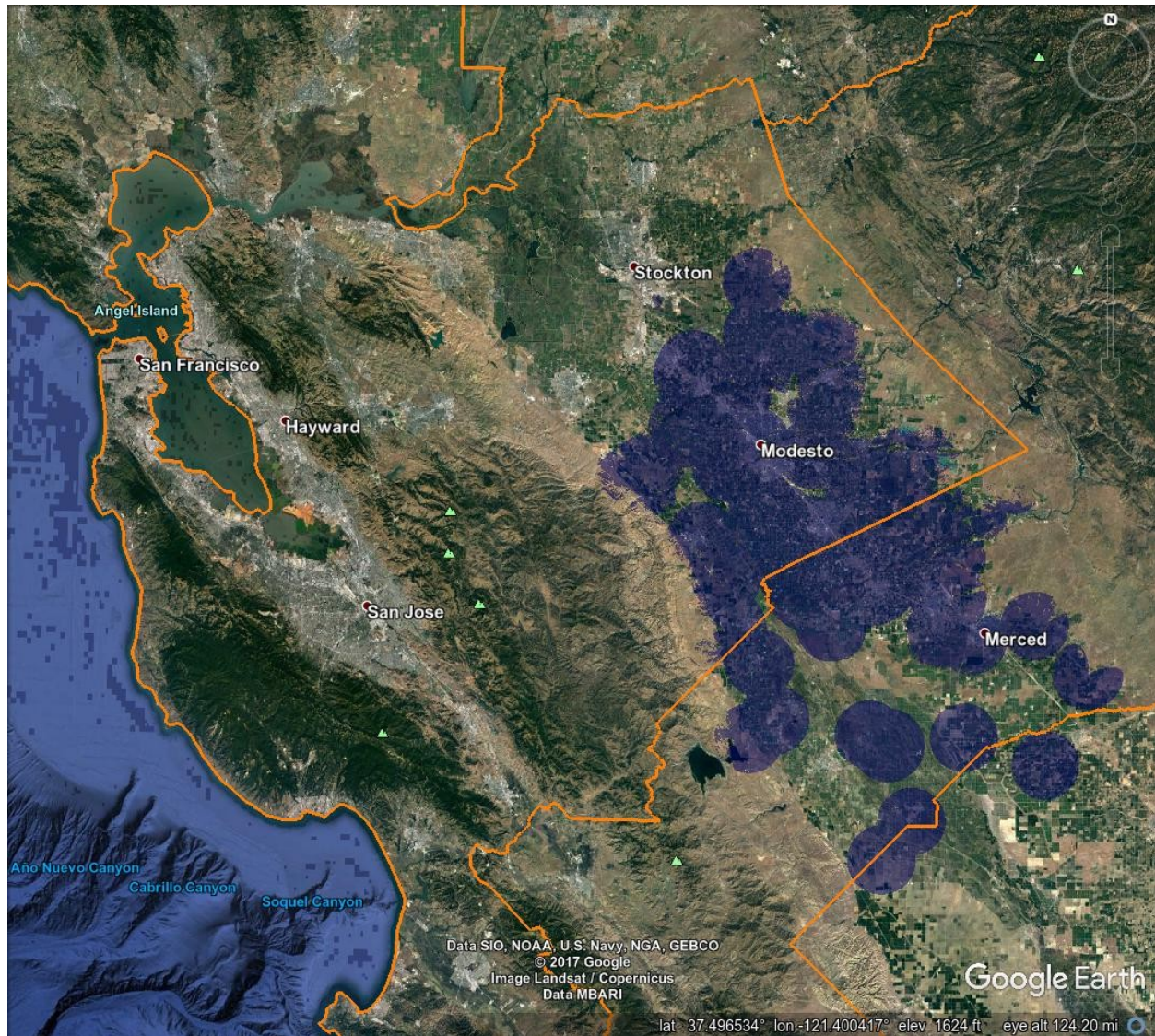
As you can see, the PEA combines the extremely dense urban markets of Silicon Valley with the rural agricultural land in the San Joaquin Valley area. The economics of these two markets couldn't be more dissimilar. We strongly encourage the FCC to consider a smaller PAL size, like the census tract as previously proposed, to allow smaller operators the ability to invest in PALs to continue our pattern of expansion and growth in these rural markets.

Fire2Wire would like to thank the FCC for the efforts it has put into the CBRS band thus far, as we believe it will be a great step towards the continued expansion and upgrading of broadband services in rural markets. However, we are strongly opposed the the increase in PAL size, and feel that using PEAs will unnecessarily and unfairly disadvantage smaller operators, the very same small operators that have been making broadband a reality for so much of rural America.

Thank you for your consideration,

Kristian Hoffmann  
President  
Fire2Wire

**Attachment: Fire2Wire Service Area & PEA boundaries**



Fire2Wire Service Area (blue), PEA boundaries (orange)